SOUTHERN DISTRICT NEW YORK	
RINALDO RIZZO,  Plaintiff,	: Case No. 13-cv-8664 (AKH)
- against -	: :
DF LAND LLC, GLENN DUBIN, <i>Individually</i> , EVA DUBIN, <i>Individually</i> , and BRENDA AMES, <i>Individually</i> .	: :
Defendants.	: : . X

INTEREST OF VECTOR DISTRICT COLUMN

## **DECLARATION OF SCOTT M. COOPER**

Scott M. Cooper, an attorney duly admitted to the United States District Court for the Southern District of New York, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

- 1. I am an attorney with the law firm of Davis Wright Tremaine LLP, attorneys for defendants DF Land LLC, Glenn Dubin, Eva Dubin, and Brenda Ames (collectively "Defendants"). I am familiar with all the facts and circumstances set forth in this Declaration. I make this Declaration in further support of Defendants' Motion for Leave to File a First Amended Answer.
- 2. Attached hereto as Exhibit A are true and correct copies of relevant portions of the deposition transcript of Brenda Ames, dated July 14, 2015.
- 3. Attached hereto as Exhibit B are true and correct copies of relevant portions of the deposition transcript of Glenn Dubin, dated July 16, 2015.
- 4. Attached hereto as Exhibit C is a true and correct copy of Defendants' First Set of Document Requests on Plaintiff, served on August 25, 2014.

5. Attached hereto as Exhibit D is a true and correct copy of the only resume that Plaintiff produced in his First Document Production.

6. Attached hereto as Exhibit E is a true and correct copy of Defendants' Second

Request for Production of Documents, served on March 20, 2015.

7. Attached hereto as Exhibit F is a true and correct copy of Plaintiff's Responses to

Defendants' Second Request for Production of Documents, served on April 20, 2015.

8. Attached hereto as Exhibit G is a true and correct copy of a letter from Scott

Cooper to Jesse Rose, dated May 1, 2015.

9. Attached hereto as Exhibit H is a true and correct copy of an e-mail from Scott

Cooper to Jesse Rose, dated May 8, 2015.

10. On May 27, 2015, Plaintiff produced a supplemental document production of 697

pages, which contained various resumes and descriptions of Plaintiff's job responsibilities while

working as estate manager for DF Land. Attached hereto as Exhibit I are true and correct copies

of resumes and employment application materials produced by Plaintiff on May 27, 2015.

11. Through June 2015, third-party employers also produced the resumes and

employment application materials that Plaintiff submitted during his job search.

12. Attached hereto as Exhibit J are relevant portions of the deposition transcript of

Rinaldo Rizzo, dated July 8, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 7, 2015.

/s/ Scott M. Cooper Scott M. Cooper

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